



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

SCJ  
F. #2017R01691

*271 Cadman Plaza East  
Brooklyn, New York 11201*

June 7, 2021

By E-Mail

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Re: United States v. Aronov et al.  
Criminal Docket No. 19-408 (MKB)

Dear Defense Counsel:

Pursuant to the Court's order regarding the defendant's motion for a bill of particulars dated May 6, 2021 (ECF No. 181), please see the attached Exhibits A and Exhibit B.

Exhibit A contains a list of the individuals who were anonymized in the Indictment and Complaint-In-Intervention filed by the Civil Division of the U.S. Attorney's Office (the "Civil Complaint"), United States v. Aronov et al., 16 CV 04853 (MKB), as well as identified individuals who worked with or for My Ideal Property Inc. ("MIP"), National Homeowners Assistance Inc. ("NHA"), Exclusive Homes Realty Group Inc. and Exclusive Homes NY, LLC (collectively, "Exclusive Homes"), Homeowners Solutions Group LTD

(“HSG”) or myshortsale.com that government believes either participated in or facilitated the charged Short Sale Scheme as unindicted co-conspirators.

Exhibit B is a list of completed or attempted short sales that the government alleges were part of the MIP and Exclusive Homes Short Sale Schemes. In addition to the short sale transactions described in the Indictment and the Civil Complaint (high-lighted in pink), at this time, the government anticipates that the properties high-lighted in yellow on Exhibit B are ones for which the government may present evidence at trial.

As the government does not typically name unindicted co-conspirators in publicly filed documents for a variety of reasons, including the potential of unfair prejudice to those individuals, the government has not filed Exhibits A or B on the docket.

Very truly yours,

MARK J. LESKO  
Acting United States Attorney

By: /s/  
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Attachments

cc: Clerk of the Court (MKB) (by ECF)(w/o attachments)